

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AIR VENT, INC.,)	Civil Action No.: 3:21-CV-00229-X
)	
Plaintiff,)	DEFENDANT KING OF FANS, INC.'S MOTION TO DISMISS FOR IMPROPER VENUE OR, IN THE ALTERNATIVE, MOTION TO TRANSFER VENUE
v.)	
POWERMAX ELECTRIC CO., LTD., GUANGDONG, DM (ASIA) LIMITED, and KING OF FANS, INC.,)	
)	
Defendants.)	
)	

COME NOW Defendant King of Fans, Inc. and files its Motion to Dismiss Plaintiff Air Vent, Inc.'s Complaint for Improper Venue pursuant to Federal Rule of Civil Procedure 12(b)(3), 28 U.S.C. § 1391(b) or, In the Alternative, Motion to Transfer Venue pursuant to 28 U.S.C. § 1406(a) or 28 U.S.C. § 1404(a).

Pursuant to Local Rule 7.1 of the United States District Court for the Northern District of Texas, King of Fans states that the matters required are set forth in its Memorandum of Law in Support of Motion to Dismiss for Improper Venue or, In the Alternative, Motion to Transfer Venue, which has been filed contemporaneously with this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant King of Fans, Inc. respectfully requests that the Court grant its Motion to Dismiss or, In the Alternative, that the Court grant its Motion to Transfer Venue, transfer this action to the United States District Court for the Northern District of Ohio, and for such other relief to which to which it may show itself justly entitled.

Respectfully submitted,

MEAGHER + GEER, P.L.L.P.

Dated: April 23, 2021

By:

*s/*David E. Bridges

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Certificate of Service

This is to certify that on April 23, 2021, a true and correct copy of the foregoing has been served electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to the following counsel of record, pursuant to the Federal Rules of Civil Procedure:

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Counsel for Plaintiff Air Vent, Inc.

Dated: April 23, 2021

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